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Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Southern District of Alabama

Southern Division

Jazmine Charles

Case No.

25-cv-77-TFM-N

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Lifeforce Digital, Inc.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jazmine Charles
Street Address	121 Glenwood Street
City and County	Mobile, Mobile County
State and Zip Code	AL, 36606
Telephone Number	3472244917
E-mail Address	jazminecharles@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	Lifeforce Digital, Inc.
Job or Title <i>(if known)</i>	
Street Address	1920 Olympic Blvd.
City and County	Santa Monica, Los Angeles County
State and Zip Code	CA, 90404
Telephone Number	18556561266
E-mail Address <i>(if known)</i>	hr@mylifeforce.com

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.)
 Health Insurance Portability and Accountability Act (HIPAA) (42 U.S.C. § 1320d et seq.)
 Retaliation Protections under the Civil Rights Act and Whistleblower Protection Laws (42 U.S.C. § 12203)
 Fair Labor Standards Act (FLSA) (29 U.S.C. § 201 et seq.)
 U.S. Constitution, First Amendment
 Equal Protection Clause, Fourteenth Amendment

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
 State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
 under the laws of the State of *(name)* _____,
 and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
 the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Lifeforce Digital, Inc., is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$7,000,000.00

This amount reflects damages arising from wrongful termination, retaliation, and violations of federal employment and privacy laws. The claim includes, but is not limited to, lost wages, future earnings, emotional distress, reputational harm, punitive damages, and statutory penalties related to HIPAA violations and federal employment protections.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Plaintiff was employed by LifeForce Digital, Inc. from 12/13/23 to 2/6/25 and consistently performed at a high level, managing a significant workload. In December 2024, Plaintiff raised concerns regarding HIPAA compliance failures and discriminatory treatment. Shortly thereafter, Plaintiff faced increased scrutiny, micromanagement, and sudden negative performance feedback that had never been documented before. On 1/10/25, Plaintiff's manager falsely claimed a Performance Improvement Plan (PIP) had been issued, yet Plaintiff never received nor acknowledged such a plan. On 2/6/25, Plaintiff was abruptly terminated without just cause, in direct retaliation for reporting compliance and workplace concerns.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks \$7,000,000 in damages for wrongful termination, retaliation, lost wages, future earnings, emotional distress, and reputational harm. Plaintiff also seeks punitive damages due to the willful and malicious nature of Defendant's actions, including HIPAA violations and discriminatory retaliation. Additionally, Plaintiff requests court costs and any other relief deemed just and proper.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/28/2025

Signature of Plaintiff

Printed Name of Plaintiff

Jazmine Charles

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address